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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

JAN 06 1983

Mr. Mark Pelley
Olin Corporation
Environmental Affairs Department, 3-F
120 Long Ridge Road
Stamford, Connecticut 06904

EPA I.D. NO.: KSD000203638

Dear Mr. Pelley:

This letter confirms the December 30, 1982, telephone conversation with Karen Flournoy of my staff, and yourself regarding the Olin Water Services facility in Kansas City, Kansas.

We have researched your December 28, 1982, inquiry regarding the Kansas Department of Health and Environment (KDHE) variance from the 40 CFR 265.176 requirement for ignitable waste in containers and the Part B permit application. As Mrs. Flournoy advised you on December 30, we request that the Part B application include a discussion of why the requirement of 265.176 cannot be met and propose alternatives to meet the intent of this regulation. We will review this information during the application review process and determine if we can grant a waiver. It is important that we develop written documentation/justification on this issue. You should also discuss local fire codes with regard to storage of ignitable waste in containers. Any further questions on this issue or the Part B application process can be directed to Mrs. Flournoy at (816) 374-6531.

Sincerely yours,

Robert L. Morby
Chief, Waste Management Branch
Air and Waste Management Division

cc: John Goetz, KDHE



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